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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA, GREAT FALLS DIVISION

JOHN D. JACKSON,

Plaintiff,

- v -

DIVERSIFIED CLINICAL SERVICES,  
INC.,

Defendant.

Case No.:

**NOTICE OF REMOVAL**

Defendant Diversified Clinical Services, Inc. files this Notice of Removal pursuant to 28 U.S.C. § 1446(a), and alleges:

1. On or about August 1, 2012, Plaintiff John D. Jackson filed a Complaint and Demand for Jury Trial in the Montana Eighth Judicial District Court, Cascade County, as Cause No. BDV 12–589 (the “State Court Action”).

2. The Summons and Complaint were served on Defendant on August 7, 2012.

3. This Notice of Removal is timely under 28 U.S.C. § 1446(b), because it is filed within thirty (30) days after receipt of the initial pleading setting forth the claim for relief upon which this action is based.

4. Plaintiff John D. Jackson is a citizen of the State of Montana.

5. Defendant Diversified Clinical Services, Inc. is a Delaware corporation, with its principal place of business in Jacksonville, Florida.

6. Complete diversity of citizenship exists between the Plaintiff and all Defendants.

7. The amount in controversy in this matter exceeds \$75,000.00.

8. The State Court Action is removable pursuant to 28 U.S.C. § 1441(a) because it is a civil action brought in a state court of which this district court has original subject matter jurisdiction pursuant to 28 U.S.C. § 1332(a)(1).

9. Venue of this action in the Great Falls Division of the United States District Court for the District of Montana is proper because the Great Falls Division of the district includes Cascade County, Montana.

10. Pursuant to 28 U.S.C. § 1446(b), a copy of the summons and complaint and all other process, pleadings and papers filed by the parties in the State Court Action are attached as Exhibits A–B.

11. Written notice of the filing of this Notice of Removal has been given to all parties to this action and a copy of this Notice of Removal has been filed in the State Court Action.

WHEREFORE, Defendant Diversified Clinical Services, Inc. respectfully requests that this action be removed in its entirety from the Montana Eighth Judicial District Court, Cascade County, to the U.S. District Court for the District of Montana and that this Court take any and all further action as is just and appropriate.

DATED this 27th day of August, 2011.

MOULTON BELLINGHAM PC

By: /s/ Gerald B. Murphy  
GERALD B. MURPHY  
EMILY JONES  
Suite 1900 Crowne Plaza  
P.O. Box 2559  
Billings, MT 59103-2559

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I certify that on this 27th day of August, 2012, a copy of this document was served on the following persons by the following means:

1-2 CM/ECF  
\_\_\_\_\_ Hand Delivery  
\_\_\_\_\_ Mail  
\_\_\_\_\_ Overnight Delivery Service  
\_\_\_\_\_ Fax  
\_\_\_\_\_ E-Mail

1. Clerk, U.S. District Court
2. Jon Kudrna  
JARDINE, STEPHENSON, BLEWETT  
& WEAVER, P.C.  
US Bank Building, Suite 700  
300 Central Avenue  
Great Falls, MT 59403  
ATTORNEYS FOR PLAINTIFF

By: /s/ Gerald B. Murphy